

Defendants' Objections to Plaintiff's Trial Exhibits

No.	Exhibit	Objection
1.	Board of Alderman Meeting Minutes pgs. 1, 13-14, 17	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
2.	Board of Aldermen Meeting Minutes pgs. 1, 6-8, 11	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
3.	Responsive records Duhamel Emails received by Ortolano	Irrelevant <i>See</i> defendants' objection ¶ 6
4.	Ortolano RTK email to Leonard for "Donchess Timeline"	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
5.	LTR emailed City Response Leonard to Ortolano	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
6.	Ortolano RTK email to Leonard second try for "Donchess Timeline"	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
7.	Ortolano email to Gary Turgiss requesting Donchess Timeline Records	Irrelevant <i>See</i> defendants' objection ¶ 4
8.	LTR emailed City Response, Leonard for Donchess Timeline with Responsive Records	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶¶ 3, 4
9.	Ortolano email to Board of Aldermen cc Donchess Mayor's Property Record Card	Irrelevant <i>See</i> defendants' objection ¶ 4
10.	Ortolano email to Board of Aldermen cc Donchess – A further look at Mayor's Property Record Card	Irrelevant <i>See</i> defendants' objection ¶ 4
11.	Board of Aldermen Meeting Minutes pgs. 1-3, 15-18, 23 and Communication from CFO Griffin Board of Aldermen	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
12.	Board of Aldermen Meeting Minutes pgs. 1-3, 7-12, 16 Mayor responds to Rockland Permit	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2

13.	Union Leader Article “Citizen Complaint prompts assessing Audit in Nashua”	Irrelevant <i>See</i> defendants’ objection ¶¶ 5, 6
14.	Board of Aldermen Meeting Minutes pgs. 1, 42-44, 47	Irrelevant, hearsay <i>See</i> defendants’ objection ¶ 2
15.	Ortolano email to DRA Commission Stepp on Ratio	Irrelevant <i>See</i> defendants’ objection ¶ 6
16.	Commissioner email response to Ortolano 3/21/19 email	Irrelevant <i>See</i> defendants’ objection ¶ 6
17.	Board of Assessor Meeting Minutes - Bolton talks about the ratio	Irrelevant <i>See</i> defendants’ objection ¶ 6
18.	Ortolano email to Greg Turgiss/Kleiner (Mayor's Office)	Irrelevant <i>See</i> defendants’ objection ¶ 6
19.	Ortolano email to Attorney Roth DRA with 2 Abatement Form (State & Nashua)	Irrelevant, litigation privilege <i>See</i> defendants’ objection ¶ 7
20.	City Charter - Section 71 Records open for Inspection	Litigation privilege, hearsay, irrelevant <i>See</i> defendants’ objection ¶ 3
21.	Board of Assessors Meeting Minutes pgs. 1, 24 - 28, 39 - 43, 46	Irrelevant, hearsay <i>See</i> defendants’ objection ¶ 8
22.	Kleiner email to Leonard fwd Ortolano email (7/12/2019)	Irrelevant <i>See</i> defendants’ objection ¶ 6
23.	LTR Leonard email to Ortolano (RTK 2019-14)	Litigation privilege, hearsay, irrelevant <i>See</i> defendants’ objection ¶ 3
24.	Leonard email to Kleiner, Legal "Conversations Assessing 8 22 19"	Irrelevant <i>See</i> defendants’ objection ¶ 6
25.	Ortolano email to Assesshelp cc Kleiner	Irrelevant <i>See</i> defendants’ objection ¶ 6
26.	LTR Leonard emailed to Ortolano (2019-15)	Litigation privilege, hearsay, irrelevant <i>See</i> defendants’ objection ¶ 3

27.	7/19/2019 LTR emailed Leonard response to Ortolano Assesshelp (2019-15)	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
28.	Board of Aldermen Meeting Minutes pgs. 1-10, 32 and with Attachment	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
29.	RTK response from Leonard for Kleiner Assessing Office meeting Agendas	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
30.	Email Ortolano to Leonard cc Donchess, BOA Right to Know Requests	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
31.	Budget Review Committee Meeting - all pages	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 11
32.	Board of Assessors Meeting Minutes pgs. 1, 5-10, 14	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 8
33.	Board of Assessors Meeting Minutes - all pages	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 8
34.	Email Kleiner to Leonard residential sales report threaded email Ortolano to Assessors (2019-122)	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
35.	Response Leonard to Ortolano (2019-122)	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
36.	BTLA Orders City to Hearing Aug 6, 2019	Irrelevant <i>See</i> defendants' objection ¶ 6
37.	Board of Alderman Meeting - LO PC on Arrest 1, 42, 47	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
38.	Email Kleiner to Attorney Clay - Ortolano to HR	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
39.	Email Nancy Trask - Ortolano visit to HR	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16

40.	Board of Aldermen Meeting Minutes pgs. 1, 13-15, 25-28, 31	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
41.	Section 1 of Nashua Assessor Manual "Public Relations in the Assessor's Office"	Irrelevant <i>See</i> defendants' objection ¶ 6
42.	BTLA Order for Reassessment	Irrelevant <i>See</i> defendants' objection ¶ 6
43.	Sanctions on Assessors - Jon Duhamel, Greg Turgiss, Rob Tozier	Irrelevant <i>See</i> defendants' objection ¶ 6
44.	Nashua Telegraph Article "Celebrate Sunshine Week"	Irrelevant <i>See</i> defendants' objection ¶ 5
45.	Ortolano email to Brown - Ortolano Abatement File	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
46.	LTR Leonard email to Attorney Lehmann	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
47.	Ortolano email to Mayor	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
48.	Board of Aldermen Zoom Meeting pgs 1, 31-33, 37	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
49.	BTLA Submission - City Motion to Consolidate 2018-2019 Abatement Appeals	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
50.	BTLA Submission - Lehmann Objection to Consolidation	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
51.	BTLA Order - DENYING Consolidation	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
52.	Scoop FB Post "Nashua's Overreach of the Right-to-Know Law"	Hearsay <i>See</i> defendants' objection ¶ 9
53.	BTLA Decision on 41 Berkeley St. 2018-2019 Abatement Appeals	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
54.	Good-Gov "Nashua Legal Offices Abuse of Seniors"	Hearsay <i>See</i> defendants' objection ¶ 9

55.	Board of Assessors Meeting Minutes - all pages	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 8
56.	Ortolano email to Assesshelp 2 Signed Abatement Applications	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
57.	Ortolano email to Assesshelp	
58.	Rick Vincent email to Ortolano	
59.	Vincent email to Ortolano 28 Baltimore Rd Application	
60.	Vincent email to Ortolano 18 Baltimore Rd. Application	
61.	Vincent email to Ortolano 18 Baltimore Rd. Application	Irrelevant, litigation privilege, hearsay <i>See</i> defendants' objection ¶¶ 7, 8
62.	Complaint - Class A Misdemeanor	
63.	Arrest Warrant	
64.	Call log for Trespass at City Hall	
65.	Property taken at arrest 2/18/21	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
66.	Bail and Bail Conditions	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
67.	RTK Request from Colquhoun to NPD for Service calls for trespass to City Hall 1/1/2014 to 1/31/2021	<i>See</i> defendants' pending motion in <i>limine</i>
68.	LTR Mike O'Connor to BOA/cc Mayor on Woman Escorted Out by Police	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
69.	Union Leader Story - "Woman Escorted out of City Hall by Police"	Irrelevant <i>See</i> defendants' objection ¶ 5
70.	Union Leader Story - "City Hall no-trespass order put in place against Nashua Woman"	Irrelevant <i>See</i> defendants' objection ¶ 5

71.	Union Leader Story - "Laurie Ortolano won't stop taking on City Hall"	Irrelevant <i>See</i> defendants' objection ¶ 5
72.	Union Leader Story "Nashua Woman escorted from City Hall charged with Trespassing"	Irrelevant <i>See</i> defendants' objection ¶ 5
73.	Ortolano email to Attorney Goulden Contract and Appearance	
74.	Kenney email to Bolton	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
75.	Kenney email to Bolton	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
76.	Email Kenney to Bolton	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
77.	Transcript Motion Hearing Judge Leary	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
78.	Conditional Discharge Order	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
79.	City Motion to Intervene on Annulment	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
80.	Order - Motion to Intervene DENIED	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 14
81.	Notice for Access to Assessing Office during Covid	
82.	Ortolano Screenshots of City Hall Offices requiring Appointments	
83.	Notice for Reopening Nashua City Hall	
84.	Ortolano email to Leonard	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
85.	Attorney Bolton email to Attorney Lehmann	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3

86.	Fee Agreement Attorney Sisti/Check pd	Blank
87.	Fee Agreement Attorney Goulden/Check pd	Blank
88.	Lovering email to Ortolano cc Legal Dept. "Your Visit to the Clerk's Office on January 31, 2022"	Irrelevant and hearsay <i>See</i> defendants' objection ¶ 16
89.	Ortolano email to Lovering and Legal	Irrelevant and hearsay <i>See</i> defendants' objection ¶ 16
90.	City Finance Committee Meeting	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 12
91.	Police Report 22-43246 Bolton Attempted Arrest for 3rd Floor Visit	<i>See</i> defendants' pending motion in <i>limine</i>
92.	Sgt. Gilbert Supplemental Report to Attempted Arrest	<i>See</i> defendants' pending motion in <i>limine</i>
93.	Ortolano email to Kleiner	<i>See</i> defendants' pending motion in <i>limine</i>
94.	Attorney Bolton email to Ortolano	<i>See</i> defendants' pending motion in <i>limine</i>
95.	Board of Aldermen Meeting Minutes pgs. 1, 13, 17	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 2
96.	Newspaper Article on First Amendment Award	Irrelevant <i>See</i> defendants' objection ¶ 5
97.	First Amendment Publication Booklet	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
98.	Eagle Sculpture Award - sculpture will be brought into Court	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
99.	City Protective Order for City Employees	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
100.	Court Order DENIED for Protective Order	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3

101.	Property Record Card for 41 Berkeley St.	Irrelevant, litigation privilege <i>See</i> defendants' objection ¶ 7
102.	Ortolano Email to Bolton RTK for IT meeting	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
103.	Ortolano Email to Bolton RTK for IT meeting	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
104.	Bolton Email to LO on RTK Meeting	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
105.	Photograph 3rd Floor Legal Office Rope	
106.	Photograph 3rd Floor Hallway to Auditorium	
107.	Photograph 3rd Floor view to IT Office	
108.	Photograph 3rd floor view to stairwell	
109.	Superior Court Order 226-2021-cv-00354	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
110.	Supreme Court Mandate 2022-0237	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
111.	Superior Court Order 226-2021-cv-00306	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
112.	Transcript Structuring Conference/Motion Hearing 00306/00133	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
113.	Superior Court Order 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
114.	Superior Court Order 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant

		<i>See</i> defendants' objection ¶ 3
115.	Superior Court Order 226-2023-cv-00165	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
116.	Ortolano Deposition by Bolton 226-2020-cv-00133	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
117.	Ortolano RTK Request for Bolton Police records - 10-4-2012 Incident 12- 83358	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
118.	BTLA Hearing A Citizens Performance Audit of the Nashua Assessing Office	Irrelevant <i>See</i> defendants' objection ¶ 6
No.	Potential Exhibits	
119.	Letter from Gary Turgiss to Ortolano's	Irrelevant <i>See</i> defendants' objection ¶ 6
120.	11/20/2019 Griffin email to Leonard threaded 9/19/2018 Tozier email to Griffin	Irrelevant <i>See</i> defendants' objection ¶ 6
121.	Letters mailed by City to 5 Berkeley property owners	Irrelevant <i>See</i> defendants' objection ¶ 6
122.	Griffin Email to Mayor's Office	Irrelevant <i>See</i> defendants' objection ¶ 6
123.	Supreme Court Order on Nashua Pheasant Lane Mall Property Abatement Appeal	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
124.	Management Audit Report	Irrelevant <i>See</i> defendants' objection ¶ 6
125.	Nashua Telegraph "Officials Say they are overwhelmed by requests"	Irrelevant <i>See</i> defendants' objection ¶ 5
126.	Cummings email to Risk and Legal	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
127.	Ortolano email RTK request to Public Works Director Fauteaux and her response	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶¶ 3,

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128.	Email Manuela Perry email to Ortolano	Irrelevant, hearsay <i>See</i> defendants' objection ¶ 16
129.	Freyler Investigative Report	Irrelevant <i>See</i> defendants' objection ¶ 6
127. (sic)	Transcript Evidentiary Hearing 226-2020-cv-00354	Litigation privilege, hearsay, irrelevant <i>See</i> defendants' objection ¶ 3
No.	Video/Audio Files	
128. (sic)	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
129. (sic)	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
130.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
131.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
132.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13
133.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13
134.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13

135.	Budget Review Committee Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 11, 13
136.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13
137.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13
138.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 8, 13
139.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
140.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
141.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13
142.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
143.	Board of Assessors Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 8, 13

144.	Finance Committee Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 12, 13
145.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
146.	School Board Recount	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 13, 16
147.	Board of Aldermen Meeting	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 2, 13
148.	Introduction on Filing an Abatement	Irrelevant, litigation privilege, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 7, 13
149.	Reading Your Property Record Card	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 6, 13
150.	The Ratio	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶¶ 6, 13
151.	3 rd Floor Video of Hallway and Legal Office	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶ 13
152.	City Hall Surveillance Video obtained by Police or Ortolano in City Hall in 1/17/2021	Irrelevant, hearsay, cumulative, undue prejudice <i>See</i> defendants' objection ¶ 13
153.	Police Dispatch Call	Irrelevant, hearsay, cumulative, undue prejudice

		<i>See</i> defendants' objection ¶ 13
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